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Via Electronic Filing

The Honorable Lois Bloom, U.S.M.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Merchan et al v. MTP Parking Lot et al*
Case No.: 19-cv-03729

Dear Honorable Judge Bloom:

This law firm represents Defendants MTP Parking Lot, MTP Investment Group, MTP Operating Corp, and LIC Operating 49 LLC (collectively, the “Defendants”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and 3, this letter respectfully serves to provide the Court with Defendants’ position statement in response to the letter motion to adjourn the telephonic conference scheduled for April 26, 2022 at 10:30 a.m., filed by Plaintiffs¹ [Dckt. No. 50].

Defendants consent to Plaintiffs’ counsel request to adjourn the telephonic conference.²

However, the undersigned is unavailable on April 26, 2022 at the times proposed by Plaintiffs’ counsel, due to unavoidable conflicting obligations. The undersigned is generally available on: (i) April 29, 2022; (ii) May 5, 2022 after 2:30 p.m.; (iii) May 9, 2022; or (iv) May 11, 2022 in the afternoon.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel

¹ “Plaintiffs” refer to Plaintiffs Wilson Morocho, Diego Cajas, Jonathan Cajas, Gustavo Merchan, and Paul E. Castro Coronel.

² Plaintiffs’ letter motion incorrectly refers to the telephonic conference as a settlement conference.